



NATIONAL WILDLIFE FEDERATION®

People and Nature: Our Future Is in the Balance

Office of the President

January 17, 2000

The Honorable Carol Browner
Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Mail Drop 1101
Washington, D.C. 20460

Dear Administrator Browner:

I am writing to express my grave concerns regarding the lack of serious consideration being given to water quality violations in the lower Snake River. I understand that your staff has been working diligently on this issue, but I am concerned that other agencies are ignoring your staff's efforts to comply with federal law. I strongly encourage you to increase your personal involvement in this issue before further decisions are made that undermine your agency's ability to enforce the Clean Water Act.

As you know, the U.S. Army Corps of Engineers operates four hydropower dams on the lower Snake River in Washington. As currently operated, these four dams violate the State of Washington's water quality standards for temperature and total dissolved gas, as well as the State's antidegradation and Class A water standards. EPA and the States of Washington and Oregon have already written to the Corps expressing their concern about these violations and urging the Corps to take actions to address them. See Letter from Chuck Clarke, EPA Region X Administrator to Brigadier General Robert H. Griffin, Commander, U.S. Army Corps of Engineers North Pacific Division (Dec. 9, 1997) ("EPA Letter"). To date, the Corps has ignored this request.

The Corps has recently released draft documents on the feasibility of removing these four federal dams. Unfortunately, the draft Environmental Impact Statement ("EIS") and accompanying economic analysis ignores entirely the costs of complying with water quality standards. Although the Corps considers this report to be a comprehensive economic review, the agency has completely disregarded the substantial economic costs that will be involved in complying with the Clean Water Act.

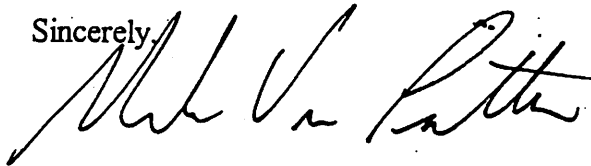
I am certain that your personal involvement on this issue is needed to make a difference. Your agency has been clear that the federal dams, like non-federal dams, must comply with the Clean Water Act. The Corps must also be convinced of this fact if we are to reach the intent expressed in the Clean Water Act and protect the imperiled species that depend on this aquatic ecosystem for their survival.

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At a minimum, the Corps' EIS should address the costs associated with Clean Water Act compliance if the four federal lower Snake River dams remain in place. To ignore this cost signals the Corps' indifference to the requirements of the Clean Water Act and sends a deeply disingenuous message to the public. Clearly, compliance with water quality standards will have significant costs. These costs must be weighed when determining whether dam removal or dam retention is the "best" option for the region and for the country.

I appreciate your time and attention to this matter. If you would like to discuss this in greater detail, please contact me at (703)790-4450. Tim Stearns, the new director of our Western Natural Resource Center, is our lead staff person on this matter; he can be reached at (503) 230-0421. I look forward to working with you and your staff on this and other matters.

Sincerely,



Mark Van Putten
President & CEO

c: Chuck Clarke, Region X Administrator

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